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BEFORE THE
Federal Communications Commission

WASHINGTON, D.C. 20554

JUN 28 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

Amendment of Section 73.202(b))
Table of Allotments)
FM Broadcast Stations)
(Moberly, Missouri))

MM Docket No. 93-99
RM-8202

To: Chief, Allocations Branch

comments of Bick Broadcasting Co. ("Bick"), the licensee of Station KXXK(FM) at Knob Noster, Missouri.^{2/}

As noted in the NPRM, the proposed allotment of Channel 288C2 to Moberly at Petitioner's specified reference coordinates is fully spaced to the recent allotment of Channel 289C2 to Knob Noster, Missouri. Bick does not object to the allotment of Channel 288C2 to Moberly at the reference coordinates.

Rather, Bick's comments focus upon the distance separation between the coordinates for Channel 289C2 at Knob Noster and the coordinates from which Station KZZT(FM) currently operates on Channel 288C3. Bick forewarns that it will object if, following allotment of Channel 288C2 to Moberly, Petitioner files a modification application to upgrade Station KZZT(FM) at its current operating coordinates without adequately protecting Bick's pending modification application to upgrade Station KXXK(FM).

Bick's concerns are premature. No shortspacing currently exists between the proposal to allot Channel 288C2 to Moberly and the allotment of Channel 289C2 to Knob Noster, and Channel 288C2 can be allotted to Moberly in full compliance with

^{2/} Bick currently operates Station KXXK(FM) on Channel 289C3 at Knob Noster, Missouri. On May 10, 1993, Bick filed a modification application seeking a construction permit to upgrade Station KXXK(FM) from Channel 289C3 to Channel 289C2, as authorized by the Report and Order in MM Docket 92-156, Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations (Knob Noster, Missouri), 7 FCC Rcd 7238 (1992). See Public Notice, Report No. 15543, released June 3, 1993, noticing File No. 930510ID as received but not yet accepted for tender.

all of the Commission's technical rules. Moreover, the Commission expressly noted in the NPRM that protection would be accorded Station KXXK(FM): "grant of a license for Station KZZT(FM) at Moberly on Channel 288C2 may be withheld until Station KXXK, Knob Noster, is licensed on its new channel."

Finally, Petitioner notes that it is fully cognizant of the Commission's mileage separation rules. Upon allotment of Channel 288C2 to Moberly, Petitioner will file a modification application that demonstrates compliance with those rules applicable to its proposal.

In light of the foregoing, Petitioner urges the adoption of the NPRM's proposal to substitute Channel 288C2 for Channel 288C3 at Moberly and to modify Petitioner's license for Station KZZT(FM) to specify operation on Channel 288C2.

Respectfully submitted.

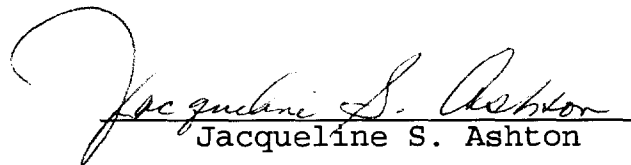
Certificate of Service

I, Jacqueline S. Ashton, certify that I have this 28th day of June, 1993, sent by regular United States, postage prepaid, a copy of the foregoing "**Reply Comments**" to the following:

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